

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

START CONNECTING LLC, d/b/a USA  
Student Debt Relief, a Florida limited  
liability company;

START CONNECTING SAS, d/b/a USA  
Student Debt Relief, a Colombia  
corporation;

DOUGLAS R. GOODMAN, individually  
and as an officer of START  
CONNECTING LLC;

DORIS E. GALLON-GOODMAN,  
individually and as an officer of START  
CONNECTING LLC; and

JUAN S. ROJAS, individually and as an  
officer of START CONNECTING LLC  
and START CONNECTING SAS,

Defendants.

Case No. 8:24-cv-1626-KKM-AAS

**STATUS REPORT AS TO PRELIMINARY INJUNCTION**

Pursuant to this Court’s order dated July 24, 2024, (Doc. 37), the Federal Trade Commission (“FTC”) and Defendants Start Connecting, LLC, Douglas R. Goodman, and Doris E. Gallon-Goodman (the “Florida Defendants”) jointly

submit this Report on the status of their negotiations on a joint stipulated preliminary injunction. Separately, the FTC reports herein on the status of its attempts to communicate with newly *pro se* Defendants Start Connecting SAS and Juan S. Rojas (the “Colombian Defendants”), who did not respond to requests for input regarding this Report.

### **A. Procedural Background**

On July 9, 2024, the FTC filed suit against the five named Defendants, alleging violations of Section 5 of the FTC Act, 15 U.S.C. § 45; the Telemarketing Sales Rule, 16 C.F.R. pt. 310; and the Gramm-Leach-Bliley Act, 15 U.S.C. § 6821, arising out of their management of a student loan debt relief telemarketing operation. (Doc. 1). Simultaneous with the Complaint, the FTC filed an Emergency *Ex Parte* Motion for a Temporary Restraining Order, Asset Freeze, Appointment of a Temporary Receiver, and Other Relief, and Order to Show Cause Why a Preliminary Injunction Should Not Issue, (Doc. 3), which the Court granted on July 11, 2024. (Doc. 13). Following a Rule 16 Conference held July 24, 2024, the Court extended the Temporary Restraining Order (“TRO”) by agreement of the parties through September 23, 2024, at 12:00pm. (Doc. 37).

### **B. Joint Report as to Florida Defendants**

FTC counsel sent a proposed stipulated preliminary injunction order to then-counsel for all Defendants on July 22, 2024. Defense counsel

subsequently withdrew as to the Colombian Defendants and now represent the Florida Defendants only. (Doc. 56). The FTC and counsel for the Florida Defendants are working diligently toward a stipulated preliminary injunction, and counsel are close to reaching an agreement as to these parties. Counsel anticipate filing a proposed stipulated preliminary injunction order for entry by the Court by September 6, 2024.

### **C. FTC Report as to Colombian Defendants**

As to the Colombian Defendants, the FTC reports as follows: Promptly after the Court granted defense counsel leave to withdraw from representing the Colombian Defendants on August 29, 2024, (Doc. 56), the FTC contacted Individual Defendant Juan S. Rojas via email to gauge his interest in a potential stipulated preliminary injunction. The FTC followed up on that email on September 4, 2024, and again on September 6, 2024. To date, Defendant Rojas has not responded to any of the FTC's emails regarding a potential stipulated injunction or other matters, nor has any newly retained counsel contacted the FTC on behalf of the Colombian Defendants. As a result, no progress has been made toward reaching a stipulated preliminary injunction as to these parties.

The Colombian Defendants have also failed to engage with the FTC following the termination of defense counsel's representation of them. To that end, the Colombian Defendants did not respond to the FTC's Motion for Order

to Show Cause Why a Preliminary Injunction Should Not Issue, nor did they meet the Court’s August 30, 2024 deadline to “respon[d] to the Motion for Preliminary Injunction.” (Doc. 37). Accordingly, the FTC shortly intends to file an Unopposed Motion for Entry of a Preliminary Injunction as to the Colombian Defendants. The FTC believes it is especially important for a preliminary injunction to issue as to the Colombian Defendants before the TRO expires in light of the representations made in the Receiver’s First Cash Accounting Report. *See* (Doc. 46 at 3–5).

Respectfully submitted,

Dated: September 6, 2024

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**CERTIFICATE OF SERVICE**

I certify that, on or about September 6, 2024, I filed this Joint Status Report using the Court's electronic filing system, which will deliver a copy of this filing to all counsel of record. I further certify that I am causing a copy of this motion to be sent via FedEx and electronic mail to the following party:

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